

Cindy McGinley

From: Brown, C David <cdbrown@pa.gov>
Sent: Monday, March 10, 2014 2:41 PM
To: Emily Strake
Cc: jroppenheim@evergreenresmgt.com; Jason Hanna; Kevin McKeever; Kevin Bilash (bilash.kevin@epa.gov); Payne, Walter
Subject: RE: Development of Lead Standard, PES Refinery and Marcus Hook Industrial Complex

Emily,

After consulting further with our risk assessor, we agree that altering the default AT and EF values in the Adult Lead Model is acceptable. These changes should be consistent with the exposure scenarios considered and they must be clearly explained in the risk assessment.

-David

From: Emily Strake [mailto:estrike@langan.com]
Sent: Friday, March 07, 2014 12:10 PM
To: Brown, C David
Cc: jroppenheim@evergreenresmgt.com; Jason Hanna; Kevin McKeever; Kevin Bilash (bilash.kevin@epa.gov); Payne, Walter
Subject: RE: Development of Lead Standard, PES Refinery and Marcus Hook Industrial Complex

David,

Thank you for DEP's review of the Adult Lead Model memorandum. Langan agrees that the averaging time (AT) for subchronic and chronic receptors will be set to 365 days/yr. EPA recommends a reduced averaging time for exposure scenarios that are expected to occur over a shorter time interval to avoid "diluting" the exposures across the entire year. Please indicate that this is acceptable to the Department.

I'm seeking further clarification on use of the EPA's default EF (219 days/yr). Langan intends to use inputs from a default exposure scenario to delineate and remediate lead-impacted soil at both PES and MHIC, and to establish a Site-Specific Standard under Act 2. As you know, the PADEP default EF used to derive ingestion and inhalation numeric values for soil is 180 days/yr. Use of 219 days/yr as the default value in the ALM would suggest that lead exposure occurs 39 days in excess of exposure to other constituents in soil for the default receptor. Therefore, for consistency, we seek the DEP's concurrence to use the PADEP's default EF of 180 days/yr, rather than EPA's default value of 219 days/yr. Please let us know if the DEP concurs.

Thank you.

Emily Strake
Project Chemist/Risk Assessor
Direct: 215.491.6526
Mobile: 267.300.6309

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Langan's goal is to be SAFE (Stay Accident Free Everyday)

From: Brown, C David [mailto:cdbrown@pa.gov]

Sent: Wednesday, February 26, 2014 3:30 PM

To: Emily Strake

Cc: jroppenheim@sunocoil.com; Jason Hanna; Kevin McKeever; Kevin Bilash (bilash.kevin@epa.gov); Payne, Walter

Subject: RE: Development of Lead Standard, PES Refinery and Marcus Hook Industrial Complex

Emily,

DEP has reviewed Langan's technical memo dated 1/27/14 on using EPA's Adult Lead Model to develop a site-specific soil standard for lead for the Philadelphia Refinery and the MHIC.

The memo indicates that values of the exposure frequency and averaging time will be based on professional judgment. EPA's defaults are EF = 219 days/yr and AT = 365 days/yr. These values should be used unless there is justification for altering them.

The ALM is an acceptable approach for deriving a site-specific standard for lead in soil.

-David

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From: Emily Strake [mailto:estrike@langan.com]

Sent: Monday, January 27, 2014 11:40 AM

To: Brown, C David

Cc: jroppenheim@sunocoil.com; Jason Hanna; Kevin McKeever

Subject: Development of Lead Standard, PES Refinery and Marcus Hook Industrial Complex

David,

Consistent with our telephone conversation on December 19th 2013, Langan has developed the attached memorandum for the use of EPA's Adult Lead Model in the development of lead cleanup standards at both the PES Philadelphia Refinery and the Marcus Hook Industrial Complex. For your reference, I've also attached the January 2013 letter that described the screening process for soils and outlined the approach for the former site-specific lead standard (Attachment A of the document). If you agree with the new approach in the memorandum, Langan would propose to revise the January 2013 letter with the new lead standard and then send it to the PADEP for concurrence. Please let me know if you have any questions or comments following review.

Best regards,

Emily Strake

Project Chemist/Risk Assessor

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